

# EXHIBIT 8

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 11 *in his capacity as Trustee of the Circuit City*  
 12 *Stores, Inc. Liquidating Trust*  
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9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: CATHODE RAY TUBE (CRT)  
 12 ANTITRUST LITIGATION

Master File No. 07-5944 SC

Case No. C 13-05261 SC

13 This Document Relates to:

MDL No. 1917

14  
 15 ALFRED H. SIEGEL, AS TRUSTEE OF THE  
 16 CIRCUIT CITY STORES, INC.  
 17 LIQUIDATING TRUST,

Plaintiff,

18 v.

19 TECHNICOLOR SA.; et al.,

20 Defendants.

**OBJECTIONS AND RESPONSES OF**  
**ALFRED H. SIEGEL, AS TRUSTEE OF**  
**THE CIRCUIT CITY STORES, INC.**  
**LIQUIDATING TRUST, TO THOMSON**  
**SA AND THOMSON CONSUMER**  
**ELECTRONICS, INC.'S FIRST SET OF**  
**REQUESTS FOR ADMISSION**

The Honorable Samuel Conti

21 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Plaintiff Alfred H.  
 22 Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust ("Circuit City Trust" or  
 23 "Plaintiff"), hereby responds and objects to the First Set of Admission of Thomson SA (n/k/a  
 24 Technicolor SA) and Thomson Consumer Electronics, Inc.'s (n/k/a Technicolor USA, Inc.)  
 25 (collectively, "Thomson") (collectively, the "Admissions" and individually an "Admission"). For  
 26 the reasons set forth below, Plaintiff generally and specifically objects and otherwise responds to

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1 each of the Admissions. Plaintiff reserves the right to supplement any responses and objections  
2 set forth below.

### 3 GENERAL OBJECTIONS

4 The following general objections ("General Objections") are incorporated in Circuit City  
5 Trust's responses to each and every Admission. No response to any Admission shall be deemed a  
6 waiver of Circuit City Trust's General Objections.

7  
8 1. Circuit City Trust objects to the Admissions to the extent that they seek to impose  
9 obligations on Circuit City Trust beyond those imposed by the Federal Rules of Civil Procedure,  
10 the Local Civil Rules of the Northern District of California, or any applicable order of the Court.

11  
12 2. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
13 information that is already in the possession, custody, or control of the propounding defendants.

14  
15 3. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
16 information that can equally or more readily be obtained by the propounding defendants from  
17 public sources.

18  
19 4. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
20 information that can more readily, conveniently, and in a less burdensome fashion be obtained by  
21 the propounding defendants from others.

22  
23 5. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
24 information not in Circuit City Trust's possession, custody, or control.

25  
26 6. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
27 information (or documents) protected from disclosure by the attorney-client privilege, the  
28 attorney work product doctrine, or any other privilege, protection, or immunity applicable under  
governing law. Any information disclosed in response to the Admissions will be disclosed

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1 without waiving, but on the contrary reserving and intending to reserve, each of these privileges,  
2 protections, or immunities. Any accidental disclosure of privileged information or material shall  
3 not be deemed a waiver of the applicable privilege, protection, or immunity.

4  
5 7. Circuit City Trust objects to the Admissions to the extent that they are  
6 unintelligible, vague, ambiguous, overly broad, unduly burdensome, and oppressive.

7  
8 8. Circuit City Trust objects to the Admissions to the extent that they seek or call for  
9 information that is not relevant, material or necessary to this action and, thus, not reasonably  
10 calculated to lead to the discovery of admissible evidence.

11  
12 9. Circuit City Trust objects to the Admissions to the extent that they are duplicative  
13 and/or cumulative either internally of themselves or of interrogatories, admissions, or document  
14 requests previously propounded to Circuit City Trust by these or other defendants in the  
15 consolidated Cathode Ray Tube (CRT) Antitrust Litigation. Each such Admission violates the  
16 Court's Order Re Discovery and Case Management Protocol entered on April 3, 2012 (Dkt. No.  
17 1128).

18  
19 10. Circuit City Trust objects to the Admissions, including the instructions and  
20 definitions, on the grounds that Circuit City Trust will incur substantial expense complying with  
21 them.

22  
23 11. Circuit City Trust objects to the Admissions to the extent they call for detailed  
24 information about the business and operations of Circuit City and its retail stores. Circuit City is  
25 no longer in the business it was in during the time period in question and in fact has been in the  
26 process of winding up its affairs for several years. Plaintiff's access to information, data and  
27 other documents is thus limited. To the extent Plaintiff uses the term "ordinary course of  
28 business" in these responses, Plaintiff refers to the business of winding up its affairs as described

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1 above rather than the ordinary course of business that Plaintiff enjoyed when it was a functioning  
2 retailer.

3 12. Circuit City Trust objects to the Admissions to the extent that they prematurely  
4 call for expert testimony or expert disclosures/opinion and states that Circuit City Trust will  
5 provide applicable expert opinion and information as provided by the Federal Rule of Civil  
6 Procedure and the orders of the Court.

7 13. Circuit City Trust objects to the Admissions to the extent they seek information  
8 about contentions or call for all evidence or all information in support of allegations or  
9 contentions. Such Admissions are premature. Circuit City Trust has not completed its discovery  
10 and preparation in this matter, and its investigation of this case is ongoing. These responses are  
11 being made after reasonable inquiry into the relevant facts, and are based only upon the  
12 information and documentation that is presently known to Circuit City Trust. Further  
13 investigation and discovery may result in the identification of additional information or  
14 contentions, and Circuit City Trust reserves the right to modify its responses. Circuit City Trust's  
15 responses should not be construed to prejudice its right to conduct further investigation in this  
16 case, or to limit its use of any additional evidence that may be developed. Additionally, Circuit  
17 City Trust objects to the Admissions to the extent they seek or call for information requiring  
18 Circuit City Trust to set out or state or marshal its case or the evidence in support of its case. It is  
19 an improper use of written discovery to make such requests.

20 14. Documents produced by Circuit City Trust in this litigation shall be deemed  
21 produced in response to the Admissions, to the extent applicable and subject to the responses,  
22 these General Objections, and any other objections made in response to a specific Admission.  
23 Where the burden of identifying specific information or documents responsive to the Admissions

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1 is substantially the same for Plaintiff and the propounding defendants, Circuit City Trust is  
2 entitled to produce documents in lieu of other responses under Rule 33(d) of the Federal Rules of  
3 Civil Procedure.

4  
5 15. Any information provided in response to the Admissions or documents produced  
6 in connection herewith will be subject to the Stipulated Protective Order entered in this action  
7 (Dkt. No. 306).

8 16. Circuit City Trust reserves its right to object to or challenge any of the Admissions  
9 or the responses thereto as relevant or material to or admissible at the trial of this case or in any  
10 hearing or motion in this case.

11 17. Circuit City Trust objects to the definition of "Identify" on the grounds that it is  
12 overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of  
13 admissible evidence. Circuit City Trust also objects to this definition as improperly requiring  
14 Circuit City Trust to state its case or marshal all evidence in support of its case in the form of  
15 responses to written discovery.  
16

17  
18 **ANSWERS AND OBJECTIONS TO ADMISSIONS**

19 **REQUEST FOR ADMISSION NO. 1:**

20  
21 Admit that You have no Evidence that Thomson SA manufactured or sold CDTs during the  
22 Relevant Period.

23 **ANSWER:**

24 Circuit City Trust refers to and incorporates its General Objections as though set forth  
25 fully herein. Circuit City Trust further objects to this interrogatory as untimely and improper to  
26 the extent that Thomson is refusing to comply with its discovery obligations and produce relevant  
27

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1 documents located in France and a corporate representative to testify regarding relevant topics.  
2 *See Recommended Order of the Special Master re: certain Direct Action Plaintiffs moving to*  
3 *compel the production of responsive documents and a competent 30(b)(6) witness from Thomson*  
4 *SA (September 2, 2014). Subject to and without waiving these objections, Circuit City Trust*  
5 *responds: Admitted.*

7 Circuit City Trust further states that discovery is on-going and reserves the right to  
8 supplement or amend its responses.

9 **REQUEST FOR ADMISSION NO. 2:**

10 Admit that You have no Evidence that Thomson SA manufactured or sold CDT Products during  
11 the Relevant Period.

12 **ANSWER:**

13  
14 Circuit City Trust refers to and incorporates its General Objections as though set forth  
15 fully herein. Circuit City Trust further objects to this interrogatory as untimely and improper to  
16 the extent that Thomson is refusing to comply with its discovery obligations and produce relevant  
17 documents located in France and a corporate representative to testify regarding relevant topics.  
18 *See Recommended Order of the Special Master re: certain Direct Action Plaintiffs moving to*  
19 *compel the production of responsive documents and a competent 30(b)(6) witness from Thomson*  
20 *SA (September 2, 2014). Subject to and without waiving these objections, Circuit City Trust*  
21 *responds: Admitted.*

22  
23 Circuit City Trust further states that discovery is on-going and reserves the right to  
24 supplement or amend its responses.

25 **REQUEST FOR ADMISSION NO. 3:**

26  
27  
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1 Admit that You have no Evidence that Thomson Consumer manufactured or sold CDTs during  
2 the Relevant Period.

3 **ANSWER:**

4  
5 Circuit City Trust refers to and incorporates its General Objections as though set forth  
6 fully herein. Circuit City Trust further objects to this interrogatory as untimely and improper to  
7 the extent that Thomson is refusing to comply with its discovery obligations and produce relevant  
8 documents located in France and a corporate representative to testify regarding relevant topics.  
9 *See* Recommended Order of the Special Master re: certain Direct Action Plaintiffs moving to  
10 compel the production of responsive documents and a competent 30(b)(6) witness from Thomson  
11 SA (September 2, 2014). Subject to and without waiving these objections, Circuit City Trust  
12 responds: Admitted.

13  
14 Circuit City Trust further states that discovery is on-going and reserves the right to  
15 supplement or amend its responses.

16 **REQUEST FOR ADMISSION NO. 4:**

17 Admit that You have no Evidence that Thomson Consumer manufactured or sold CDT Products  
18 during the Relevant Period.

19 **ANSWER:**

20  
21 Circuit City Trust refers to and incorporates its General Objections as though set forth  
22 fully herein. Circuit City Trust further objects to this interrogatory as untimely and improper to  
23 the extent that Thomson is refusing to comply with its discovery obligations and produce relevant  
24 documents located in France and a corporate representative to testify regarding relevant topics.  
25 *See* Recommended Order of the Special Master re: certain Direct Action Plaintiffs moving to  
26 compel the production of responsive documents and a competent 30(b)(6) witness from Thomson  
27

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1 SA (September 2, 2014). Subject to and without waiving these objections, Circuit City Trust  
2 responds: Admitted.

3 Circuit City Trust further states that discovery is on-going and reserves the right to  
4 supplement or amend its responses.  
5

6 Dated: September 5, 2014.

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7  
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